



Scottish Council for
Development and Industry

POLICY SUBMISSION

HIGHLAND WIDE LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT

November 2009

SCDI is an independent and inclusive economic development network which seeks to influence and inspire government and key stakeholders with our ambitious vision to create shared sustainable economic prosperity for Scotland.

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Highland wide Local Development Plan: Main Issues Report

1. SCDI is an independent membership network that strengthens Scotland's competitiveness by influencing Government policies to encourage sustainable economic prosperity. SCDI's membership includes businesses, trades unions, local authorities, educational institutions, the voluntary sector and faith groups.

The Vision for the Highlands

Vision

2. SCDI supports the vision for the area; however it would suggest a few additions.
3. The vision does not mention the potentially key role which ICT can play in achieving targets for productivity, economic growth, public sector services and efficiencies and CO₂ emission reductions, especially in areas such as Highland. This is surprising because Wealthier and Fairer Highland outcomes identified by Community Planning Partners include better telecommunications infrastructure, business growth and ensuring that services are accessible, narrowing the gap and limiting the impact of distance from services in remote and rural communities. Progress has been made with broadband, but it will not be internationally competitive going forward. *Digital Britain* has recommended how high-speed broadband could be rolled out to rural and remote areas, but it is recognised that further public sector funding may be required. In addition to Competitive, Sustainable and Adaptable the Highlands Economy is well-placed to be Innovative in a number of key sectors, especially with the development of the University of the Highlands and Islands. Investment in an ICT infrastructure for the public sector could be a powerful enabler for all of these objectives for the economy by establishing a 21st century infrastructure which would benefit both private and public sectors. SCDI is therefore surprised that it does not feature in the Vision for the Highlands or as a Policy Option in the Main Issues Report.
4. New development should also make the area a more attractive location for visitors. Renewable energy policy should also be about supporting the expansion of the industry to achieve CO₂ targets and maximise economic opportunities.
5. The vision should be delivered in the Highland wide Local Development Plan by:
 - Clear and co-ordinated subject policy statements which are understood and used by planning authorities, developers and communities to guide the preparation of development plan policy and appropriate proposals
 - Linkages to relevant national/ regional/ local policies, targets and outcomes
 - Culture change, with references to the critical role of planning authorities, developers and communities in the delivery of policies and projects which are enablers and not barriers to sustainable economic development in the area

The Spatial Strategy

Inverness

6. SCDI supports the Council's Preferred Option. The proposal for an updated city vision is welcome. Inverness is the Highland's only city-region and it has experienced rapid change. Its success is vital for the whole area and Scotland.
7. The timetable for river and canal crossing section of the Inverness Trunk Link Road is uncertain following the Strategic Transport Projects Review and the project is not in The Highland Council's capital programme. This raises questions about whether the housing developments at Ness-side and Charleston, could be completed before there is expansion in other areas, particularly the A96

corridor, given the pressure that developments on the west side of the city would put on city centre roads. SCDI therefore believes that development in the A96 corridor should take place alongside development of any remaining sites in Inverness.

The A96 Corridor

8. SCDI supports the Council's Preferred Option. A growing population is important for the future of the whole Highland economy. As the Main Issues report states, the A96 Corridor is an Area for Co-Ordinated Action identified in Scotland's National Planning Framework 2. Highland Council's A96 Corridor Framework examined all the issues and recommended that the A96 should be a growth area. The Strategic Transport Projects Review, which will guide transport infrastructure investment in the next 20 years, has identified the need to accommodate growth in the corridor by dualling the A96 between Inverness and Nairn and providing a new rail station, airport interchange and new park-and-ride facilities at Dalcross.
9. SCDI believes that development in the corridor should be phased from 2011. This would take place alongside development of any remaining sites in Inverness, such as west of the Ness and canal, which may face transport infrastructure constraints and, in consequence, be slower in coming on stream. SCDI welcomes the practical and realistic proposals to advance development in the corridor using a mix of the existing infrastructure capacity, public transport improvements and traffic management measures including park and ride and bus priority to reduce peak time congestion. Capacity studies should be undertaken at key junctions, and transport modelling and detailed master planning of the key development sites should be progressed, particularly for A96 dualling alignment and junction arrangements east of Inverness, at Nairn, and at Tornagraim.
10. SCDI does not believe that the other options are either realistic or would support the vision of the Highlands being one of Europe's leading regions. The option of expanding sites in the rest of the Inner Moray Firth would face infrastructure constraints, especially the capacity of the Clachnaharry and Kessock bridges. Allowing no further development in the A96 Corridor until major infrastructure projects are in place would result in incremental development in other areas. SCDI believes that it is important to plan for growth rather than allow development to take place in a piecemeal way. Site searches and infrastructure studies would slow growth which would send a negative signal to businesses, including potential investors, and skilled people, about the region's ambitions.

Development Contributions in the A96 Corridor

11. Work is ongoing between the Scottish Government, public sector authorities and private sector on development viability and formal government guidance or advice on development viability should be regarded as an important tool for planning authorities and the Scottish Government once it becomes available, such as in determining proportionate and reasonable private sector contributions.
12. The economic circumstances of the private development industry are unlikely to return to pre-2008 levels for many years. In order to support its recovery, contributions should be for public transport not expensive arterial road works.

Area Specific Issues East Inverness

13. SCDI supports the Council's Preferred Option. The University of the Highlands and Islands is at the heart of the vision for the Highlands. SCDI believes that the development of the new campus at Beechwood is the best option for Inverness College UHI and for the Highlands and Islands. The Beechwood site offers far greater scope than the existing location at Longman to develop high quality, integrated facilities, including a total of 800 residencies, which would be attractive to and better serve local, national and international students and staff at Inverness College UHI. This alone would generate a much greater economic leverage. Cogentsi has calculated that, at

£147m a year, the development would contribute almost twice as much to the economy as redevelopment at Longman.

14. Moreover, among the other facilities which the site could accommodate would be a potential phase IV of the Centre for Health Science and a science and technology park for businesses linked to the university and other establishments. With more young people retained in and attracted to the Highlands for their studies, and rewarding career and entrepreneurial opportunities in this cluster of innovative companies around the campus, the Beechwood site would create additional economic benefits, and Cogentsi estimates, support the region's population outcomes with an additional 20,000 people working in the area.
15. Bus priority, park and ride and active travel links between the East of Inverness and the city centre are especially important if development is to proceed in advance of A96 dualling. The larger green-field site at Beechwood does, at present, appear to involve higher risks, with greater infrastructure needs, especially in respect of transport access for students, and fewer amenities. Highlands and Islands Enterprise and The Highland Council, along with national agencies including Transport Scotland and Scottish Water, should provide the necessary clarity and reassurances on these points in order to mitigate the risks. SCDI understands that there are question marks over the proposed rail halt site because of the steep gradient of the line. It hopes that Inverness College UHI will be offered firmer plans for road, subsidised bus and pedestrian access to Beechwood, and it will be demonstrated how further amenities for students will become available as the centre of gravity of Inverness city moves to the east.

Nairn

16. SCDI supports the Council's Preferred Option, which would identify the expansion sites at Delnies and Nairn South in the Proposed Plan. Significant development is proposed in these areas between the south of the town and the railway line and the preferred line of the by-pass. Better connection is required from central Nairn with its employment, retail and community facilities to these new areas to deliver the vision of encouraging active travel and reducing CO₂ emissions. A public transport interchange should be provided at the railway station, with improved parking, cycle and pedestrian access and cycle storage.

Tornagrain

17. SCDI's Highlands and Islands Committee has supported the Preferred Option of sustainable development of the A96 corridor between Inverness and Nairn, including a new town at Tornagrain. It believes that this will help to deliver national and local policy outcomes. The Highland Single Outcome Agreement agreed by the public sector identifies "more people living, working and studying in the Highlands as essential to enable sustainable economic growth". Inverness is the only city-region in the Highlands and in recent years it has been one of the fastest growing in Europe. Accommodating this growth in the next thirty to fifty years will be essential if the city-region is to be an attractive location in which to live and work, and for investment in key priority 21st century business sectors.
18. SCDI considers that new stand-alone settlements should only be approved if they are properly planned and co-ordinated. Tornagrain is a development which shows best practice in terms of community involvement through "Charrettes", design, sustainability and ensuring that the development is sympathetic to its surroundings. The Outline Planning Application illustrated the high priority which is given to pedestrians and sustainable transport, mixed housing and development, and local services and employment opportunities. This has been recognised in its selection by the Scottish Government for the Sustainable Community Initiative. SCDI believes that Tornagrain can be a leading model of environmentally friendly development for all of Scotland, especially if innovative local solutions for renewable energy and utility supply are supported in planning.

19. The current economic downturn should have no significant impact on the development of such a very long-term plan. Construction is not scheduled to begin until 2012 and will take 35 years to complete. Furthermore, as the economy recovers, the employment and supply chain benefits and signal of long-term confidence in the development of the region should be a particularly important consideration. Tornagrain is significant not just for the A96 corridor, but for the whole of the Highland region; and not just for current residents, but for prospective new members of our communities and for future generations.
20. It is important that the relationship between Tornagrain and Inverness Airport Business Park, the station at Dalcross, and the A96 dualling route is made clear.

Smaller Settlements in the A96 Corridor

21. SCDI supports the Council's Preferred Option.

Caithness and North Sutherland

22. SCDI supports the Council's Preferred Option. It agrees that the Local Development Plan "must enable and support the delivery of on-shore facilities, services and sites to ensure that this important inward investment opportunity is capable of being delivered". Development at Scrabster Harbour will be especially important. As recommended by the Marine Strategy Group, the Plan should also support electricity grid reinforcements in the Pentland Firth strategic growth area for marine renewables. The Marine Energy Group and the Pentland Firth Coordination Committee are working to synchronise developer activity and deliver grid capacity for the projects emerging from the Pentland Firth leasing round. Key development priorities should be identified in the Proposed Plan.
23. Caithness is an important gateway. Improved road and public transport access to the Gills Bay terminal for the ferry service to Orkney should also be included.

Easter Ross and Nigg

24. SCDI supports the Council's preferred option. In its response to the Discussion Draft of the National Planning Framework 2 SCDI said that "the Nigg Fabrication Yard, given the circumstances surrounding its potential re-development and its links to developments in Scotland's energy sector, should also be considered a nationally significant project." The National Planning Framework for Scotland 2, the long-term spatial strategy for Scotland's development to 2030, states that: "The fabrication yard at Nigg has potential as a facility for decommissioning oil and gas installations and the manufacture and support services required by the renewable energy industry. Its deep water is an asset of strategic importance".
25. As SCDI commented on the Nigg Development Master Plan, the proposal to expand the yard greatly has implications for transport and utilities infrastructure.
26. The Scottish Government, Scottish Enterprise and Highlands and Islands Enterprise are currently completing work on the Scottish Renewables Infrastructure Projects to identify infrastructure dependencies such as transportation of raw materials and finished components. HITRANS, which SCDI advises, is also commissioning a study on the onshore transport infrastructure improvements which would enable the industry to locate and invest in the region. Conclusions should be included in the Highland wide Local Development Plan. Should a marine/ rail/ road interchange at Nigg, and improved rail freight capacity and rail access to Nigg be identified, The Highland Council should seek their inclusion in the investment programmes of Transport Scotland or Network Rail.
27. Once the industrial water requirements are known in detail, flow and pressure tests would have to be undertaken to ascertain the carrying capacity of the public mains network to supply the site without adversely affecting water supplies to existing customers. Any major industrial water user

would need to make significant investment to further expansion of Newmore treatment works and possibly increasing the size of the water mains linking Newmore and Nigg. There would be similar issues in respect of wastewater treatment and disposal. If the mothballed Nigg service reservoir has to be brought back into operational use, its condition would have to be assessed and brought up to current standards. The costs of this work may be an economic limitation on potential uses of the site.

Development of Local Centres

28. SCDI supports the Council's Preferred Option. Local centres will make significant contributions to the vision for the Highlands. The Main Issues Report mentions their importance at a local level and for tourism. However, with the development of the University of the Highlands and Islands, ICT infrastructure and renewable energy, there is no reason why key centres such as Fort William should not attract and retain both international students and globally-ambitious businesses.

Wider Countryside and Fragile Areas

29. SCDI supports the Council's Preferred Option. While fishing, farming and forestry are still important sectors of the economy, there is a need for diversification and growth in the economy in this area to meet local needs, with ICT and tourist-related developments having a role to play. Encouraging employment growth in these areas is a central part of making them more sustainable and reducing the need to commute, with its economic, social and environmental consequences.
30. Levels of growth in individual settlements should relate to local needs. While there should be a mix of housing opportunities, the focus should be on providing smaller homes to buy or rent, and a significant amount of affordable housing.

Policy options for the Highland wide Local Development Plan

Sustainable Highland Communities Population and Housing

31. SCDI supports the Council's Preferred Option. The latest report from the Registrar General for Scotland projects a bigger rise for Scotland's population than was expected two years ago. Boosted by a higher birth rate and migration, it is projected to surpass the previous highest population ever as early as 2012 and rise from 5.17 million in 2008 to 5.36 million in 2018 and 5.54 million in 2033, an increase of 7 per cent over a 25 year period. This suggests that growth rates in Highland may continue to exceed previous estimates, and supports the Council's decision to use a high growth scenario in the preferred options for development.
32. SCDI welcomes the clear message that population growth and housing supply are critical in delivering sustainable economic development. The Scottish Government's 'Firm Foundations: The Future of Housing in Scotland' strategy recognises this link and aims to increase the rate of new housing supply to at least 35,000 by the middle of the next decade. This will require development plans which are about outcomes, delivery of housing and faster processes.
33. SCDI also welcomes the positive approach in the Main Issues Report to a "generous" supply of land and a range and choice of sites. However, it should be made clearer that the private sector is a key partner in all aspects of the plan-making process. There should be regular input from developers and other parties. The role and involvement of the industry has, generally, been omitted. Planning authorities also need to demonstrate in the development plan process how the housing land supply will be integrated into wider capital spending by the public sector and reflect the priorities set out in Single Outcome Agreements.

34. SCDI would suggest that The Highland wide Local Development Plan could include a commitment to measuring how many new homes are built in Inverness compared to the other city regions in Scotland and other places in the rest of the UK and further afield, and to similar comparisons for Highland's local centres.

Housing in the Countryside

35. SCDI supports the Council's Preferred Option. However, the draft Scottish Planning Policy confirms that the requirement for development to plans to allocate a "generous" supply of land to meet housing needs applies equally to urban and rural areas. This is not at present reflected in the Main Issues Report.
36. SCDI also supports a differentiation between pressurised countryside and remote areas where regeneration and support is critical to promote their viability. Sufficient housing in rural areas has a role in keeping prices at affordable levels. SCDI welcomes the reference to the opportunities for small scale housing developments and replacement of rundown housing or conversion of traditional buildings. New, originally designed housing can attract entrepreneurs to rural Scotland. Scottish Planning Policy recognises that planners need to be realistic about the availability or likely availability of alternatives to road transportation.

Affordable Housing

37. SCDI supports the use of evidence from the Housing Needs and Demand Assessment in making decisions. It is important that an appropriate mix of types and size of homes are supplied to meet the need of whole communities. However, SCDI is concerned that the Council is proposing to reduce flexibility on demands for and the definition of affordable housing, and for planning agreement contributions, at a time when the house-building and wider property sector is struggling with development viability and has been calling for greater flexibility. If projects do not proceed for affordability reasons, this will negatively impact on the Scottish Government's housing and sustainable economic growth targets.

Planning for an Ageing Population

38. No comment.

Gypsies / Travellers

39. No comment.

Retailing

40. SCDI supports the Council's Preferred Option. SCDI supports the policy requirement for planning authorities to identify a network of centres and take a sequential approach to town centres and retailing to the selection of sites. However, policy should be able to adapt to changing circumstances and settlement patterns which may lead to former town centres no longer being assessed as the most appropriate centre within the network for retail development. This requires flexibility and realism from planning authorities, developers, owners and occupiers to ensure that different types of retail and commercial uses are developed in the most appropriate location, and recognition of "commercial realities", especially during a prolonged economic downturn.
41. Sustainability should be an important consideration for planning authorities and through energy efficient design and location in an appropriate area which reduces travel distances, new retail development can reduce carbon emissions.
42. With city, town and district centres the focus for mixed uses including retail, there is a need for accessibility for the delivery of goods. This can be done most efficiently and with least impact on road congestion outside the peak hours for traffic during the day. However, the movement and

delivery of goods in town centres has been restrained by planning authorities because of concerns over noise pollution. Technical improvements on vehicles and equipment are reducing their sound and SCDI would support a requirement for all such planning restrictions being subject to regular review which takes this into account.

Developer Contributions

43. The ability of the development industry to fund large amounts of infrastructure through developer contributions has been greatly diminished in the recession. Development viability for projects may no longer stack up where excessive demands are made for contributions and therefore the scope of demands from public authorities should be reduced if development is still to be encouraged.
44. Developers should be and are willing contribute to infrastructure where appropriate. The development industry recognises that where a new development proposal will impose new burdens there is a need to discuss mitigation. It is important, though, that, in devising the contributions strategy, The Highland Council is careful to prioritise the key infrastructure requirements of the development and does not overly-widen the demands to be made of developers.
45. SCDI welcomes the emphasis in the Main Issues Report upon certainty and predictability and looks forward to the proposals. But it is aware of some concern that current policy is diverging from the fundamental principles of ensuring contributions are proportionate and relevant to the development in question.
46. SCDI would recommend that the Highland Council considers phasing of developer contributions and investigates the use of innovative funding mechanisms like tax increment financing to support infrastructure investment.

Safeguarding Our Environment Natural, Built and Cultural Heritage

47. SCDI supports the Council's Preferred Option. However, national policy in relation to the historic environment is that planning should have regard to sustainable economic growth and this is missing from the Main Issues Report. There appears to be a new national approach to facilitating positive change in the landscape rather than attempting simply to safeguard it. The creation of green corridors, especially around settlements, could enhance the quality of life.
48. SCDI has been concerned that the draft Scottish Planning Policy lacked detailed guidance. To ensure consistency, it is important that the Highland wide Local Development Plan provides clarity on the principles which planners will apply.

Previously Used Land

49. SCDI supports the Council's Preferred Option. New development on this land will close the gap between the wealthy and most disadvantaged areas of the region.

Wild Land

50. SCDI supports the Alternative Option. Wild land may at times be needed for renewable energy related developments with clear local, national and European environmental benefits. Each application should be considered on their merits.

Water Environment

51. SCDI supports the Council's Preferred Option. River Basin Management Plans are being prepared in partnership to deal with these issues and should be incorporated into the Highland

wide Local Development Plan. The Council should also consider a target to avoid new development preventing water bodies achieving 'good ecological status' under the Water Framework Directive.

Sustainable Development and Climate Change

ICT

52. SCDI is surprised that the potential of ICT is not prominent in the Main Issues Report. The draft Scottish Planning Policy says that "planning authorities should support the expansion of the telecommunications network, including broadband infrastructure, through the development plan and development management decisions. The high level of ADSL coverage in the Highlands and Islands when compared to many developed economies and the high take-up of broadband services has supported the success of the region's creative industries. It has been estimated that including rural areas in the UK's digital future could help to release around £347bn into England's economy alone. This includes opportunities for SMEs to work collaboratively and gain access to new markets. Design Innovation Scotland is developing a project called Distributed City aimed at creating distributed enterprises across key sectors in the Highlands and Islands together with SMEs, HIE, MIT and key university contacts in Scotland.
53. Digital technologies can also support innovative, accessible and personalised public services like eHealth, and climate change mitigation and adaptation. For example, the UK's ICT research hubs are investigating a combination of social networking systems such as Twitter with GPS technology to develop car sharing networks, connecting individuals and coordinating offers and requests in real time on mobile devices, and integrated transport information systems to provide up to minute travel planning advice across all modes of transport. They are also researching early warning flood systems for rural residents and businesses. Better access to ICT and state-of-the-art video conferencing can promote flexible working and home working, and reduce the need for some business travel.
54. In order to be comfortably placed for future applications like these, research for Cisco by Oxford University's Said Business School and the University of Oviedo's Department of Applied Economics estimated that countries would need an average download speed of 11.25Mbps and an upload speed of 5Mbps. In response, the UK Government states in the *Digital Britain* report that it believes the case is made for the desirability of next generation networks, with significantly higher broadband speeds, typically in excess of 20Mbit/s, being available to the large majority of the UK population, with this commitment to be delivered by a mix of technologies. It is vital to the Vision of the Highlands and a range of Policy Options that most if not all of the Highlands achieve this target. Finland is aiming for 99% of households and business to 100Mbit/s by 2015.
55. There is limited 3G coverage outside of the regional capital Inverness. It is estimated that 28% of phone lines in the Highlands and Islands are unable to receive broadband services at a speed of 2Mbit/s or greater, compared to 11% of the UK, which is mainly due to both the nature of the telecoms infrastructure. SCDI believes that an aim should be for all development in the growth areas to have access to modern, up-to-date high-speed telecommunications networks.
56. Based on the estimated costs, the level of investment planned by BT Openreach, and the levy proposed in Digital Britain, Analysis Mason has estimated that the commercial roll-out of next generation access in the Highlands and Islands could approach 85%, comparable to the roll-out of first generation broadband. In order to maximise coverage in the area, the planning system needs to recognise the importance of enabling the expansion of this mix of technologies taking into account the economic and social implications of not having full coverage. Furthermore, rural areas need to take advantage of technology trials and demonstrations to achieve some earlier roll-out. The UK Government has recently announced that scientists from the University of Aberdeen will be awarded £12 million over five years to research how new digital technologies can benefit rural communities and businesses, and this work will offer opportunities.

57. The availability of 3G mobile broadband is presently limited to urban areas. Following the publication of the Digital Britain by the Government, it is expected that mobile operators will gain access to new spectrum that will allow them to increase 3G coverage to match 2G coverage in the medium term. This would include all major settlements and transport routes in rural areas. Operators need to be encouraged to deploy mobile broadband once new spectrum is available. SCDI has also highlighted the need to work with mobile phone network providers to improve coverage, including efforts to enhance coverage while on the move.

Renewable Energy

58. SCDI support the Council's Preferred Option. The interim target for a 42 per cent cut in carbon emissions in the Climate Change (Scotland) Bill and the European Union's legally-binding targets for renewable energy generation by 2020, underline the even greater urgency behind these policy priorities. It is important, too, that the transition to a low carbon economy is viewed as an opportunity.
59. SCDI believes that all planning authorities and statutory consultees should support and encourage the continued growth of all renewable technologies to facilitate the achievement of the 2020 target and beyond, and the scope for developments to contribute to national or local economic development priorities should be a material consideration when considering policies and decisions.
60. An updated Highland Renewable Energy Strategy should be prepared as part of a comprehensive and inclusive process and there is an important role which pre-application discussions should play. SCDI believes that flexibility for developers to bring forward sites outwith the development plan should be retained and welcomes the proposed approach in the Main Issues Report to identify sites and provide criteria for developments which are not proposed on designated sites.
61. Electricity transmission grid reinforcements are vital in the bid to combat climate change and unlock the full potential of renewable energy in the Highlands. That is why SCDI strongly supports the Beaully-Denny upgrade. This project will also enable work on the other projects which Ofgem has recently proposed funding over the next two years, the reinforcement of the grid connection between Beaully and Keith, and Beaully and Dounreay, and a new substation at Knocknagael, and, probably in the mid to late 2010s, the development of subsea networks.
62. While there is a reference to the 2020 target for total renewable energy use, the vast majority of the policy options focus on electricity and not heat or transport.
63. There should be a specific reference to small and community developments, which may be developed or involve local rural businesses. Community projects may, together, offer cumulative benefits towards the Scottish Government's renewable electricity target for 2020, offset the carbon emissions from agriculture and rural businesses, and provide cheap, clean heat and power as well as a potential source of revenue for rural communities through supply of electricity to the grid. The Highland wide Local Development Plan should also refer to the associated infrastructure required in rural areas - such as grid connections, sub-stations and roads - to achieve these national priorities and local outcomes.
64. In respect of the technologies, there may also be scope for larger scale geothermal and there is a lack of detail about how large scale biomass plants should be assessed on amenity, air quality and transport issues and how development plans should address them. An equivalent degree of support should be offered in planning for biomass as for wind farms where appropriately located.
65. As previously mentioned, HITRANS is undertaking research into the transport requirements for renewables development and the conclusions on search and support locations should inform the Highland wide Local Development Plan.

Flooding

66. SCDI supports the Council's Preferred Option. SCDI agrees that developments should generally be avoided on land which is at an unacceptable risk from coastal or river flooding, except in exceptional circumstances. But development on functional flood plains will need to continue if the Scottish Government is to achieve its ambitious housing and economic growth targets. With climate change likely to increase the frequency and severity of flooding, planning authorities should be encouraged to identify solutions to flooding and drainage issues in low to medium risk areas which would permit economic development. Landraising, underbuilding or the raising of buildings on stilts should be identified by The Highland Council as potential ways to reduce flood risk if it can be shown to planners and SEPA that the floodplain will continue to function effectively.

Waste Management

67. SCDI supports the Council's Preferred Option. Waste management has been a significant concern for SCDI both because of sustainability issues and the steep decline in operational landfills in Scotland and increasing transportation and treatment costs are predicted to increase significantly waste costs for business. This resource must be managed in an efficient and environmentally friendly way, in line with the 'waste hierarchy' and taking the 'proximity principle' into account. There is a need for provision of more accessible and affordable alternatives to commercial waste disposal in the form of recycling and waste treatment centres.
68. In response, to the Scottish Government's Zero Waste Plan, SCDI has said that up-to-date data and clear guidance on national and regional infrastructure requirements and the proximity principle of particular products, would better inform development planning. It has also highlighted that early engagement between the private sector, local authority waste managers and communities on these requirements would improve development planning. This should ensure that sufficient and suitable sites and/ or locational criteria are identified.
69. The Zero Waste Plan re-affirms the environmental benefits of the Recovery component of the waste hierarchy. Energy from waste reduces CO₂ emissions from landfill and the need to generate electricity from fossil fuels, and, therefore, providing the waste is pre-treated and the emissions are tightly controlled, has a part to play in achieving the Scottish Government's climate change targets. However, community support for the energy from waste infrastructure necessary to help limit landfill to the Zero Waste's Plan target of no more than 5% of the municipal waste total by 2025 is often undermined by negative campaigning. SCDI believes that impartial information should be provided on Recovery to communities, their representatives, planners and other decision makers. It is important that the Highland wide Local Development Plan should send a strong signal on the economic and environmental benefits of energy from waste.
70. New development should be designed to enable the collection of waste. If new developments of flats have specific space for recycling containers inside and, for collection, outside this would encourage more recycling and enable greater segregation of materials. If developments have space for individual rather than communal bins this increases household accountability for waste and supports the introduction of steps, such as fortnightly collections, which limit disposal.

Air Quality

71. SCDI supports the Council's Preferred Option.

Sustainable Design

72. SCDI supports the Council's Preferred Option. New developments must be designed and built to use resources more efficiently and be located in places where they have as little an effect on the environment as possible. Developers should examine the scope for including technology, such as combined heat and power schemes and ground-source heat pumps, when preparing proposals.

But there should continue to be flexibility where developers can demonstrate technical constraints. The Sullivan report concluded that building standards offer a more effective regulatory route to achieve energy efficiency and carbon reduction than planning, and there must be an appropriate balance in planning advice between design and construction methods, and micro-generation.

A Competitive, Sustainable & Adaptable Highland Economy Business and Industrial Land

73. SCDI supports the Council's Preferred Option. It believes that The Highland Council should adopt a pro-active and welcoming approach to proposals which come forward in all key sectors and, indeed, from any sector. Marine renewables and tourism have been highlighted, but there are also significant opportunities in food and drink, life sciences, the digital economy, education and the wider energy industry, in which sectors the Highland economy already has strengths.
74. SCDI welcomes the policies of identifying the strategic sites for economic development in the Highlands. It would suggest that consideration is given to targets for the minimum amount of land available to businesses at all times in a range of places within Inverness city-region and local centres, and for a specific proportion of the land within the Inverness city-region to be of a standard which will attract high-quality businesses or be suitable for company headquarters.

Accessibility and Transport

75. SCDI supports the Council's Preferred Option.
76. The strategic outcomes in the National Transport Strategy should be included:
 - Improve journey times and connections between our cities and towns and our global markets to tackle congestion and provide access to key markets
 - Reduce emissions to tackle climate change
 - Improve quality, accessibility and affordability of transport, to give people the choice of public transport and real alternatives to the car
77. SCDI welcomes the links made between the national – the National Planning Framework 2 and the Strategic Transport Projects – and the Local Transport Strategy. However, references should also be made to the Regional Transport Strategy's policies and themes should be identified, including key links to neighbouring council areas with any support requirements at the Highland end.
78. There is no reference to the Scottish Ferries Review, the Strategic Transport Projects Review for the sea. Strategic onshore improvements which are identified for the Highland area will need to be included into the Highland wide Local Development Plan. Similarly, there should be reference to incorporating relevant findings from HITRANS's ongoing review of Highlands and Islands Air Services. With this in mind, Broadford airport should be identified as a potential key air link.
79. Planning Circular 12/1996 states that developer contributions for the enhancement of public transport services or infrastructure may be sought when these are "justifiable". In a period when finance is likely to remain seriously constrained, excessive claims for contributions from developers would not support investment in the economy and communities. SCDI believes that the appropriate criteria for seeking contributions should be "reasonably required".
80. Electric vehicles are likely to be the first technology to be influential in reducing Greenhouse Gas Emissions from the transport sector and will make an even more significant contribution post-2020. A hydrogen corridor is also planned between Aberdeen and Peterhead, with hydrogen fuelling stations, and it is proposed to extend this corridor to Inverness via Findhorn in Moray. This highway will employ a diversity of renewable energy solutions in different locations with hydrogen refueling stations placed at strategic locations along the route to service a range of

users including public transport providers, local authority vehicles, Royal Mail vans and ultimately private car users. This first phase would eventually be extended north to the Western and Northern isles.

81. The planning system also has a role in enabling the infrastructure which will power the low carbon vehicle of the future through more flexible planning rules for the installation of charging points for domestic vehicles, the granting of public land for the development of charging or hydrogen fuelling stations and the requirement for charging stations on new roads, retail or leisure developments. Low carbon vehicles could be entitled to preferential use of road space and allowed to drive in bus lanes, given free parking town centres where parking is traditionally metered or ticketed, and offered free parking in residential areas.
82. SCDI is however concerned that Government policy should seek to avoid the creation of a two-tier transport network in the longer term, with low carbon vehicles increasingly popular in city-regions such as Inverness, and higher cost and less accessible conventional fuel in rural, remote and island communities.

Crofting and Agriculture

83. SCDI supports the Council's Preferred Options.
84. Food security is likely to become a more important national priority as a result of the impact of climate change. There will also be opportunities for Scotland to increase its exports of agricultural produce. The draft Scottish Planning Policy referenced renewable energy generation development and mineral extraction being acceptable where restoration proposals will return the land to its former status. The Highland wide Local Development Plan should be consistent. Clarification is required on whether the criteria for a 'major' infrastructure development are the same as those established in the new planning hierarchy.

Coastal Development

85. There is a critical interface between marine planning and land use coastal planning. SCDI welcomes the policy of providing a clear link between the Local Development Plan and the Coastal Development Strategy in advance of the establishment and implementation of the new marine planning system at the regional level. This needs to lead to the creation of an integrated, streamlined approach to sustainable economic development in Highland's coastal areas.
86. Minimising conflicts of interest is especially important where offshore development of wind, wave and tidal energy would have an impact on whether the onshore coast is considered to be developed. The best natural resources are often located around the most isolated coasts. SCDI generally accepts the presumption against development in these areas, it may be that essential onshore infrastructure is required for such offshore developments. Where no practical alternatives exist and after weighing up the wider environmental benefits, there may be circumstances in which some development is needed if Scotland is to achieve its statutory renewable energy and climate change targets.
87. While the Council has some Aquaculture Framework Plans, these do not provide anything approaching a comprehensive coverage of the substantial marine resources in the Highland area, which are potentially suitable for aquaculture developments. Some additional consideration of these areas may be provided by the Highland wide Local Development Plan but it is apparent that a comprehensive planning framework, as envisaged in the Marine (Scotland) Bill, will not be available for many years. In the absence of a comprehensive planning framework, it is recommended that the Highland wide Local Development Plan and Local Development Plans are augmented by a process of "developer-led planning" based on initial pre-application discussions with the planning authority.

Forestry and Woodland

88. SCDI supports the Council's Preferred Option. SCDI understands that Scottish Renewables is in discussion with the Forestry Commission Scotland on the means of implementing a policy of no net loss of woodland and the presumption against any loss unless there is a significant and clearly defined public benefit. It is important that consideration is given to negative and positive impact of the removal of woodland and of the new land use. For example, wind turbines are temporary structures which will be critical in achieving the Scotland's climate change targets. The outcome of the discussion should be reflected in the proposed interim revision of the Highland Forest and Woodland Strategy 2006.

Minerals

89. SCDI supports the Council's Preferred Option. SCDI prefers the phrase from the draft Scottish Planning Policy that "an adequate and steady supply of minerals is essential to support sustainable economic growth". Development plans should avoid the sterilisation of minerals where possible and appropriate. Once search areas are established, they should not unnecessarily be reviewed, modified or deleted, and in all cases, there should be consultation with the industry.

A Healthier Highlands

Open Space and Physical Activity

90. SCDI supports the Council's Preferred Option. However, it should be stated that a key reason for allowing development on an open space is that it may be replaced with something at least as good or better. It is important, especially in economic downturn, that developer contributions are only used where appropriate and only where there is a deficit of open space in the local area.

Access to the Outdoors

91. SCDI supports the Council's Preferred Option.

Gareth Williams
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